

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:
	:
Plaintiff,	:
	:
v.	:
	:
STEVEN DONZIGER, et al.,	:
	:
Defendants.	:
----- X	

Case No. 11 Civ. 0691 (LAK)

**DECLARATION OF JASON B. STAVERS
IN FURTHER SUPPORT OF CHEVRON CORPORATION'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, JASON B. STAVERS, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Colorado and admitted to practice before this Court pro hac vice. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Chevron Corporation ("Chevron") in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise.

2. Attached hereto as Exhibit A is a true and correct copy of a Stipulation and Order dated June 21, 2001 and entered in *Aguinda v. Texaco Inc.*, Case No. 93-cv-7527 (JSR) (S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from a brief filed January 11, 1999 by Texaco Inc. in *Aguinda v. Texaco Inc.*, Case No. 93-cv-7527 (JSR) (S.D.N.Y.).

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from a brief filed January 11, 1999 by the plaintiffs in *Aguinda v. Texaco Inc.*, Case No. 93-cv-7527 (JSR) (S.D.N.Y.).

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from a brief filed December 20, 2001 by Texaco Inc. in *Aguinda v. Texaco Inc.*, Appeal No. 01-7756(L) (2d Cir.).

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from a brief filed January 25, 1999 by Texaco Inc. in *Aguinda v. Texaco Inc.*, Case No. 93-cv-7527 (JSR) (S.D.N.Y.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2013 at Denver, Colorado.

Jason Stavers

A handwritten signature in black ink, appearing to read 'Jason Stavers', is written over a horizontal line.